

AO 91 (rev.11/11) Criminal Complaint

AUTHORIZED AND APPROVED DATE: 3/10/2022AMG 1/5/22United States District Court  
for theWESTERNDISTRICT OFOKLAHOMA

UNITED STATES OF AMERICA,

)

v.

)

PAUL MATTHEW ROBLEDO,

)

Case No: M-22-2-AMG**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of December 18, 2021 in the county of Lincoln, in the Western District of Oklahoma, the defendant violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent, David McCauley, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), which is incorporated and made a part hereof by reference.

 Continued on the attached sheet.
  
 Complainant's signature
DAVID McCAULEY  
Special Agent  
ATF

Sworn to before me and signed in my presence.

Date: January 5, 2022City and State: Oklahoma City, Oklahoma
  
 Judge's signature
AMANDA MAXFIELD GREEN, U.S. Magistrate Judge  
Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

**STATE OF OKLAHOMA              )  
  )  
COUNTY OF OKLAHOMA             )**

**A F F I D A V I T**

I, David McCauley, being duly sworn, do hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), a Division of the United States Department of Justice, having been so employed since June 2018. Prior to my employment with ATF, I was a police patrol officer in Hampton, Virginia for seven years. I am a graduate of the Department of Homeland Security's Criminal Investigator Training program as well as the ATF Special Agent Basic Training Program. As a Special Agent with ATF, I am vested with the authority to investigate violations of federal laws.

2. I have been assigned to the ATF Oklahoma City field office since December 2018. I am familiar with the information contained in this affidavit through personal investigation and/or information received from other law enforcement agencies and officers, mentioned herein, who have participated in and/or have contributed documentary reports of their investigative efforts in this matter. This affidavit contains information necessary to establish probable cause in support of this complaint and is not intended to include every fact, or matter, observed or known by me.

3. This affidavit is presented for the limited purpose of seeking a federal complaint and arrest warrant for Paul Matthew ROBLEDO, a male with a date of birth XX/XX/1986. This complaint and arrest warrant are being sought for a violation of Title 18, United States Code, Section 922(g)(1).

PROBABLE CAUSE:

4. On December 18, 2021, at approximately 1:26AM, Deputy Kevin Chapman and Deputy Steven Hinkle from the Lincoln County Sheriff's Office (LCSO) were dispatched to the residence of 890061 S. 3395 Road in Chandler, Oklahoma<sup>1</sup> for a report of multiple gunshots fired from the front porch of that residence. Deputies attempted to make contact at the residence by knocking on the front door but were unable to make contact. LCSO Deputies moved to the rear of the residence and knocked on the back door. Once deputies knocked, they could hear movement inside the residence. Deputies believe they heard someone operating the charging handle on a rifle from inside the residence.

5. Deputies then set up a perimeter around the residence. At 1:50 AM dispatch advised deputies on scene that a female inside of the residence was calling 911. The female advised that there were multiple females inside of the residence who were trying to leave the residence but the male suspect, later identified as ROBLEDO, would not allow anyone to leave. However, at 1:52 AM two adult females and two juveniles exited the residence.

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<sup>1</sup> This residence is located in Lincoln County within the Western District of Oklahoma.

6. Once the females were escorted to safety Deputies spoke to a witness, Jonstella Neal. Ms. Neal advised that ROBLEDO was highly intoxicated due to consuming and entire bottle of "Captain Morgan". Ms. Neal advised that ROBLEDO retrieved HIS rifle from HIS bedroom and began to fire several shots from the porch of HIS residence. Ms. Neal advised that ROBLEDO was a convicted felon but did have the rifle and a large amount of ammunition inside of the residence.

7. Deputies attempted to have ROBLEDO exit the residence by communicating via loudspeaker. ROBLEDO did not exit the residence and at 4:19 AM deputies entered the residence. Deputies entered the residence through the front door and located ROBLEDO in the south bedroom asleep. Deputies observed the rifle, Smith & Wesson, model M&P 15., .223 caliber rifle bearing serial number TS26931 laying on the floor near the bed where ROBLEDO was sleeping. After a brief struggle ROBLEDO was placed under arrest and removed from the residence.

8. After Placing ROBLEDO under arrest Lincoln County Deputies also located the following items inside of ROBLEDO's residence: a 2.23/5.56 magazine near the front door on a shelf in the living room; a 2.23/5.56 magazine on the floor in the living room; One (1) live round on the floor of the living room; a foregrip on living room couch; an ammunition case with seventy (70) live rounds inside and stripper clips and seven (7) live 12-gauge shotgun shells in

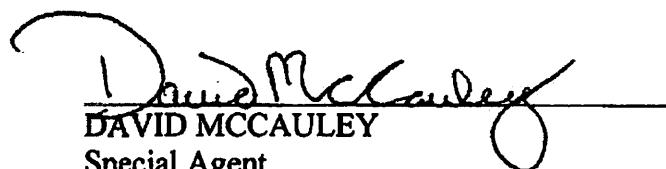
bedroom near the bed; a gun case with a 2.23/5.56 magazine on the bathroom floor; 78 spent 2.23/5.56 casings in the front yard near the front porch.

9. On January 4, 2021, I searched the Oklahoma Department of Corrections website and learned that ROBLEDO has at least one prior felony conviction for a crime punishable by a term of imprisonment exceeding one year, specifically, Creek (Bristow) County CF-2009-00244 - Uttering Forged Instruments, Lincoln County CF-2013-00202 - Trafficking in Illegal Drugs, Carrying a Concealed Weapon, and Obstructing an Officer, Lincoln County CF-2013-00260 - Unlawful Possession of CDS, Concealing Stolen Property, Possession of Firearm AFCF, Possession of Sawed-Off Shotgun, Lincoln County CF-2014-00024-Possession of Contraband by Inmate, and Tulsa County CF-2009-4796 - Uttering Forged Instruments. I reviewed the cases on the Oklahoma State Courts Network and learned that ROBLEDO was present for all pertinent court proceedings, and therefore I believe he had knowledge of his prohibiting convictions.

10. On January 4, 2021, Special Agent Brian Anderson, an ATF Firearms Interstate Nexus Examiner, examined the following firearm: a Smith & Wesson, model M&P 15., .223 caliber rifle bearing serial number TS26931. It is SA Anderson's opinion, based on his examination, that the firearm was not manufactured in Oklahoma, and therefore crossed state lines to reach Oklahoma, thereby affecting interstate or foreign commerce.

11. Based on the above facts and circumstances, I believe that probable cause exists that on or about December 18, 2021, in Chandler, Oklahoma, within the Western District of Oklahoma, Paul Matthew ROBLEDO, was in possession of a firearm in violation of Title 18, United States Code, Section 922(g)(1). I respectfully request that the Court issue a Criminal Complaint and Arrest Warrant for Paul Matthew ROBLEDO.

**FURTHER I SAITH NOT.**



DAVID MCCUALEY  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and Sworn to before me this 5<sup>th</sup> day of January 2022.



AMANDA MAXFIELD GREEN  
United States Magistrate Judge